

1 RAFII & ASSOCIATES, P.C.  
2 PETER WILLIAMSON, Esq. (SBN 97309)  
3 9100 Wilshire Boulevard, Suite 465E  
4 Beverly Hills, California 90212  
5 Telephone: (310) 777-7877  
6 Facsimile: (310) 777-7855  
7 *peter@rafiilaw.com*

8 Attorneys for Plaintiff  
9 TERESA ALVARADO CURIEL

10  
11 **UNITED STATES DISTRICT COURT**  
12 **EASTERN DISTRICT OF CALIFORNIA – SACRAMENTO DIVISION**

13 TERESA ALVARADO CURIEL,  
14 Plaintiff,

15 vs.

16 COSTCO WHOLESALE  
17 MEMBERSHIP, INC., et al.,

18 Defendants.

Case No. 2:22-CV-02224-DAD-DMC

**STIPULATED REQUEST TO  
MODIFY SCHEDULING ORDER  
AND ORDER THEREON**

19  
20  
21 AND RELATED CROSS-ACTIONS

22 IT IS HEREBY STIPULATED by and between the parties to this action,  
23 through their respective counsel, as follows:

24 1. Pursuant to the Court's current Scheduling Order, the parties are required  
25 to disclose initial experts and produce expert reports in accordance with Federal Rule  
26 of Civil Procedure 26(a)(2) by no later than **May 23, 2024**, with rebuttal reports  
27 produced on or before **June 6, 2024**;  
28



2. The parties have agreed to participate in a private Mediation which has been scheduled for June 20, 2024 at 10:00 a.m., before the Hon. Thierry Patrick Colaw (Ret.). The date selected was the first date that Judge Colaw was available.

3. The parties wish to avoid the time and expense of disclosing experts prior to the scheduled Mediation in the hope the case will resolve at the Mediation.

4. Based on the foregoing, the parties respectfully request a slight modification of the current Scheduling Order to postpone the date to disclose experts and produce expert reports to **July 8, 2024**, roughly two weeks after the scheduled Mediation, with rebuttal reports produced on or before **July 22, 2024**.

5. It is further requested that the date for completion of Expert Discovery be **August 24, 2024**.

6. It is further requested that all motions, except motions for continuances, temporary restraining orders, or other emergency applications, shall be noticed to be heard on or before **October 5, 2024**.

7. The slight modification of the scheduling order will not affect the final pretrial conference currently set for **November 12, 2024**, nor the trial date currently set for **January 27, 2025**.

DATED: May 17, 2024

Respectfully submitted,

RAFII & ASSOCIATES, P.C.

By: /s/ PETER M. WILLIAMSON

Peter M. Williamson, Esq.

Attorneys for Plaintiff

TERESA ALVARADO CURIEL

//

//

//

1 DATED: May 17, 2024

MAIRE & DEEDON

2  
3 By: /s/ PATRICK L. DEEDON  
4 Patrick L. Deedon, Esq.  
5 Attorneys for Defendant/Cross-  
6 Complainant COSTCO WHOLESALE  
CORPORATION

7 DATED: May 17, 2024

MACDONALD & CODY LLP

8  
9 By: /s/ DEBRA L. BRAASCH  
10 Debra L. Braasch, Esq.  
11 Attorneys for Defendant/Cross-  
12 Complainant CLIMATE PROS LLC  
13  
14

**ORDER**

**IT IS SO ORDERED** and the pretrial scheduling order is modified as follows:

1. The parties shall disclose initial experts and produce reports in accordance with Federal Rule of Civil Procedure 26(a)(2) by no later than **July 8, 2024**, with rebuttal reports produced on or before **July 22, 2024**;

2. Expert Discovery shall be completed no later than **August 24, 2024**;

3. All motions, except motions for continuances, temporary restraining orders, or other emergency applications, shall be noticed to be heard on or before **October 5, 2024**.

Dated: May 22, 2024



DENNIS M. COTA  
UNITED STATES MAGISTRATE JUDGE